



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

194448

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(Red)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Armstrong World Industries
Attn: David D. Wilson, Senior Attorney
P.O. Box 3001
Lancaster, PA 17604

JAN 29 1991

RE: Berks Landfill, Sinking Spring, PA

Dear Mr. Wilson:

The U.S. Environmental Protection Agency ("EPA") is seeking additional information concerning a release, or threat of release, of hazardous substances, pollutants or contaminants into the environment at the Berks Landfill, Sinking Spring, PA (the "Site"). Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), Armstrong World Industries ("Armstrong") is required to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), pollutants, contaminants, and/or hazardous wastes as defined by Section 1004(5) of RCRA, 42 U.S.C. Section 6903(5), which were transported to, stored, treated, or disposed of at the above referenced Site. EPA has reviewed Armstrong's November 14, 1990 response to EPA's Information Request letter and has determined that the response needs additional clarification.

The provisions in Section 104 of CERCLA, 42 U.S.C. Section 9604, and Section 3008 of RCRA, 42 U.S.C. Section 6928, authorize EPA to pursue penalties for failure to comply with these sections or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

As used herein, the term "documents" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, awards of contracts, proposals, policies of insurance, logs, books of original entry, minutes of meetings,

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memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific studies or investigations, schedules, price lists, telegrams, teletypes, phono-records, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

Armstrong is requested to address in full, from the time period of 1950 through 1986, each of the following items:

1. During the course of its investigation with respect to the Site, EPA obtained information which indicates that a) wastes were hauled to the Site in green tractor trailers. EPA requests that Armstrong confirm or deny this information; b) wastes were described as a brown, gluey substance which emitted a strong linoleum, oil-based smell, that smelled like paint, but was not paint. EPA requests that Armstrong confirm or deny this information. In addition, please state the following:

a. Describe the process which generates or generated the brown, gluey substance;

b. Provide the constituents of the brown gluey substance. The information provided should include the chemical composition, physical state (solid, liquid, gas), and any analysis that was performed on such substance; and

c. Describe Armstrong's tractor trailers as identified in Armstrong's November 14, 1990 response, which is attached, specifically, the color, any markings on the trucks (logos and lettering), and any special devices or machinery on the truck. Include a description of any other tractor trailers owned by Armstrong besides those identified in the November 14, 1990 letter.

d. For each tractor trailer identified in "c" above, describe the purpose and/or use of each tractor trailer.

2. Prior to June of 1980, when Armstrong entered into a contractual relationship with Stabatrol Corporation, who disposed of Armstrong's waste as described in Enclosure 15 (marked confidential) of Armstrong's November 14, 1990 response. Further provide:

a. The ultimate disposal location of such wastes; and

b. The documents evidencing the information provided in 2a.

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Your response should also include the source of all information and documents you are providing. With respect to documents, you should identify the date, author, addressee, current location, and custodian of each document submitted.

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you.

Please respond in writing to this required submission of information within 10 days of your receipt of this letter.

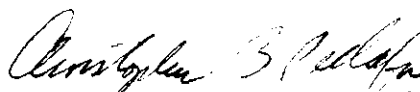
All documents and information should be sent to:

Joan Armstrong
U.S. Environmental Protection Agency
PRP Search Section (3HW11)
841 Chestnut Building
Philadelphia, PA 19107

If you have any questions concerning this matter, please contact Ms. Armstrong at (215)597-0531. If you have specific legal questions relating to this matter, please contact Kathleen Root at (215)597-8920. Technical questions can be referred to Dianne Walker at (215)597-3168. All questions concerning this matter must be addressed to the above persons prior to the time specified above.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Sincerely,



Peter W. Schaul, Chief
Superfund Programs Branch

Enclosure

cc: D. Walker (3HW21)
K. Root (3RC32)
B. Hofman (PADER)

P 382 147 656

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

Form 3800, June 1985

Sent to <i>Armstrong World Ind.</i>	
Street and No. <i>PO Box 3001</i>	
P.O. State and ZIP Code <i>Lancaster PA 17604</i>	
Postage	\$
Certified Fee	✓
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date <i>Sent 1/29/91</i>	

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Armstrong World Industries
P.O. Box 3001
Lancaster, PA 17604

4a. Article Number

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4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Keith Shore

PS Form 3811, October 1990

★U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

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United States Postal Service

Official Business



PENALTY FOR PRIVATE
USE, \$300

Print your name, address and ZIP Code here

Joan Armstrong (3HW11)
841 Chestnut Bldg. EPA 6th Flr.
Philadelphia, PA 19107